

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**FEE STATEMENT COVER SHEET FOR THE
PERIOD MARCH 1, 2022 THROUGH APRIL 30, 2022**

Debtor: LTL Management LLC (“ LTL ”)	Name of Applicant: King & Spalding LLP (“ K&S ”)
Case No.: 21-30589 (MBK)	Client: Special Counsel to LTL Management LLC
Chapter: 11	Case Filed: October 14, 2021 (the “ Petition Date ”)

**SECTION I
FEE SUMMARY**

<input checked="" type="checkbox"/> Monthly Fee Application No. 4	<input type="checkbox"/> Interim Fee Application	<input type="checkbox"/> Final Fee Application
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Summary of Amounts Requested for the Period March 1, 2022 through April 30, 2022 (the “**Fourth Statement Period**”)

Total Fees for the LTL Debtor:	\$168,385.00 ¹
Total Disbursements:	\$11,971.00
Total Fees Plus Disbursements:	\$180,356.00
Minus 20% Holdback of Fees	\$33,677.00
Amount Sought at this Time:	\$146,679.00

Summary of Amounts Requested for Previous Periods:

	FEES	EXPENSES
Total Previous Fee Requested:	\$993,545.55	\$18,359.92
Total Fees Allowed To Date:	\$0.00	\$0.00
Total Retainer (If Applicable):	\$0.00	\$0.00
Total Holdback (If Applicable):	\$198,709.11	\$0.00
Total Received By Applicant:	\$794,836.44	\$27,935.32

¹ The total amount of fees and expenses incurred by K&S during the Fourth Statement Period for matters in which it is solely representing LTL or is representing LTL jointly with Johnson & Johnson is \$194,382.60. Of this amount, as set forth in this fee statement, K&S is seeking payment in the amount of \$168,385.00 in fees and \$11,971.00 in expenses from LTL. K&S’ fees for matters in which it is solely representing Johnson & Johnson are not reflected in this monthly fee statement.

**COMPENSATION BY PROFESSIONAL
MARCH 1, 2022 THROUGH APRIL 30, 2022**

The attorneys who rendered professional services in these chapter 11 cases Fourth Statement Period are:

NAME OF PROFESSIONAL PARTNERS AND COUNSEL:	YEAR ADMITTED	HOURLY RATE	TOTAL MARCH HOURS BILLED	TOTAL APRIL HOURS BILLED	TOTAL HOURS BILLED	TOTAL COMPENSATION
Bush, Matthew	2012	725.00	7.3	-	7.3	\$5,292.50
Fournier, Kristen	2002	832.00	44.8	12.3	57.1	\$47,507.20
Hoffmann, Timothy	2003	1,240.00	13.9	-	13.9	\$17,236.00
Hynes, Kevin	2013	731.00	20.7	-	20.7	\$15,131.70
Johnson, Paul	1984	850.00	4.9	-	4.9	\$4,165.00
Total Partners and Counsel:			91.6	12.3	103.9	\$89,332.40

NAME OF PROFESSIONAL: ASSOCIATES:	YEAR ADMITTED [†]	HOURLY RATE	TOTAL MARCH HOURS BILLED	TOTAL APRIL HOURS BILLED	TOTAL HOURS BILLED	TOTAL COMPENSATION
Adovasio, Amy	2011	345.00	14.1	-	14.1	\$4,864.50
Baker, Britney	2018	888.00	38.1	7.8	45.9	\$40,759.20
Foster, Stacy	2012	720.00	12.5	-	12.5	\$9,000.00
Gascoine, Evan	2008	510.00	40.2	7.8	48.0	\$24,480.00
Total Associates:			104.9	15.6	120.5	\$ 79,103.70

[†] *Not Yet Admitted

The paraprofessionals who rendered professional services in these chapter 11 cases during the Fourth Statement Period are:

NAME OF PARAPROFESSIONALS AND OTHER NON-LEGAL STAFF	HOURLY RATE	TOTAL MARCH HOURS BILLED	TOTAL APRIL HOURS BILLED	TOTAL HOURS BILLED	TOTAL COMPENSATION
Fermin, Luis	345.00	6.1	-	6.1	\$2,104.50
Total Paraprofessionals & Other Non-Legal Staff:				6.1	\$2,104.50

The total fees for the Fourth Statement Period are:

PROFESSIONALS	BLENDED RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
TOTALS:			
Partners and Counsel:	\$859.79	103.9	\$89,332.40
Associates:	\$656.46	120.5	\$79,103.70
Paraprofessionals and Other Non-Legal Staff:	\$345.00	6.1	\$2,104.50
Blended Attorney Rate:	\$750.61		
Blended Rate for All Timekeepers:	\$739.87		
Total Fees Incurred:		230.5	\$170,540.60
Less Fees for Johnson & Johnson Only Representation:			(\$2,155.60) ²
Total LTL Debtor Fees:			\$168,385.00

² For ease of reference, fees charged 100% to LTL, as well as those charged 50% to LTL and 50% to Johnson & Johnson, are broken down separately in Section II while disbursements are similarly distinguished in Section III.

**SECTION II
SUMMARY OF SERVICES**

**COMPENSATION BY WORK TASK CODE FOR
SERVICES RENDERED BY KING & SPALDING LLP
FOR THE PERIOD MARCH 1, 2022 THROUGH APRIL 30, 2022**

100% LTL

TASK CODE	DESCRIPTION	MARCH HOURS	APRIL HOURS	TOTAL HOURS	AMOUNT
L002	Case Administration	0.1	4.1	4.2	\$3,121.40
L004	Fee/Employment Applications	52.8	7.8	60.6	\$58,660.80
L005	Relief from Stay Proceedings	17.3	5.1	22.4	\$18,636.80
L006	Litigation Consulting	127.3	10.9	138.2	\$85,759.40
Totals:		197.5	27.9	225.4	\$166,229.40

50% LTL / 50% Johnson & Johnson

TASK CODE	DESCRIPTION	MARCH HOURS	APRIL HOURS	TOTAL HOURS	AMOUNT
L008	Litigation - Work on Appeals	5.1	-	5.1	\$4,311.20
Totals:		5.1	-	5.1	\$4,311.20
Less Fees for Johnson & Johnson Only Representation:					(\$2,155.60)
Total Fees Requested:					\$2,155.60

**SECTION III
SUMMARY OF DISBURSEMENTS**

**DISBURSEMENT SUMMARY BY KING & SPALDING LLP
FOR THE PERIOD MARCH 1, 2022 THROUGH APRIL 30, 2022**

100% LTL

DISBURSEMENTS	MARCH AMOUNTS	APRIL AMOUNTS	TOTAL AMOUNTS
-	-	-	-
Totals:	-	-	-

50% LTL / 50% Johnson & Johnson

DISBURSEMENTS	MARCH AMOUNTS	APRIL AMOUNTS	TOTAL AMOUNTS
Court Reporter	\$23,742.00	-	\$23,742.00
Total:	\$23,742.00	-	\$23,742.00
Less Expenses for Johnson & Johnson Only Representation:			(\$11,871.00)
Total Requested:			\$11,871.00

**SECTION IV
CASE HISTORY**

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|--|--|
| (1) Date cases filed: | October 14, 2021 |
| (2) Chapter under which case commenced: | Chapter 11 |
| (3) Date of retention: | December 16, 2021 <i>nunc pro tunc</i> to October 14, 2021 [Dkt. 859] (the “Retention Order”) ³ . |
| (4) Summarize in brief the benefits to the estate and attach supplements as needed | SEE BELOW |

During the Fourth Statement Period, King & Spalding LLP (“King & Spalding”) provided the following services to the Debtor including, but not limited to, the following:

Case Administration

- Discuss material contingency quarterly update needed for client reporting obligations.
- Assist with compiling objections to Ducera and FTI retentions and related billing.

Litigation Counseling

- Review plaintiff records and case information to gather data needed for experts to analyze claims in preparation for bankruptcy mediation.
- Discuss and draft brief regarding Edley lift stay motion and application of automatic stay to industrial talc cases.
- Compile and provide to access to various cases folders in preparation of document production to various attorneys general.
- Prepare memorandum of relevant information related to industrial talc including historical document review data, relevant trial testimony, and comparison of allegations in prior talc matters to assist in bankruptcy matter
- Discuss developments in insurance coverage matters, retention issues, and related issues.
- Attend hearing on objections to various retention applications including Skadden, Weil and Jones Day.
- Discuss preparations for mediation and next steps in chapter 11 case.
- Discuss and draft notices and status updates regarding bankruptcy, automatic stay and preliminary injunction requested by state and federal courts.
- Update pending case lists and other materials for bankruptcy teams.

³ The Retention Order is attached hereto as Exhibit A.

- Discuss ordinary course professional billing guidelines.
- Attend fee examiner hearing.
- Address issues and other matters relating to talc-related litigation.

Relief from Stay Proceedings

- Discuss and draft analysis of industrial talc stay issues, Edley lift stay motion and next steps.
- Review allegations in attorney general actions for discussions with bankruptcy team.

Fee Application Preparation

- Correspond with Jones Day to discuss monthly fee statement and billing guidelines.
- Prepare interim fee application, monthly fee statement and related exhibits, including review and revise invoices for privilege and compliance with U.S. Trustee's Guidelines.

Litigation – Work on Appeals (50% Johnson & Johnson Split)

- Address various strategic issues and other matters relating to appeals.
- Compile materials for appellate briefing.
- Communicate with counsel regarding various issues, including those relating to briefing and appellate strategy.

(5) Anticipated distribution to creditors:

(a) Administration expense:	Unknown at this time.
(b) Secured creditors:	Unknown at this time.
(c) Priority creditors:	Unknown at this time.
(d) General unsecured creditors:	Unknown at this time.

(6) Final disposition of case and percentage of dividend paid to creditors

Final dividend percentages are unknown at this time.

I certify under penalty of perjury that the above is true.

Date: June 1, 2022

/s/ Kristen R. Fournier

Kristen R. Fournier